

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:)	
)	
JEFFREY K. BOYD)	Case No. 10-23798-WL
SHIRLEY A. JENKINS-BOYD)	(Chapter 13)
)	
)	
Debtor)	
)	

UNOPPOSED MOTION FOR WITHDRAWAL OF APPEARANCE
PURSUANT TO LOCAL RULE 9010-4(b) AND
REQUEST FOR WAIVER OF 7 DAY NOTICE

THE BURNS LAW FIRM, LLC (the “Firm”), hereby files this Unopposed Motion to Withdraw its appearance pursuant to 9010-4(b) and Request for Waiver of 7 Day Notice (the “Motion”), and states as follows:

On June 18, 2010 (the “Petition Date”), a voluntary Chapter 11 case under the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (the “Code”), was filed by Jeffrey K. Boyd and Shirley A. Jenkins-Boyd (the “Debtors”) in the United States Bankruptcy Court for the District of Maryland. At all times, the undersigned represented the Debtor to the best of his abilities and to the best results that the Debtor would permit herein. The Firm based on knowledge and belief and the observations made by the Debtor has achieved each and every goal sought by the Debtors over the period of time which the Firm represented the Debtors. By the accounts of all parties, the Firm has completed its job and has done a good job.

Notwithstanding this, the Debtors have a 10 year plan of reorganization, and they have a good deal of monitoring that will be required by either their own oversight as fiduciaries and trustees, or through a third party professional or professionals who can aid them in that endeavor. The Firm has been unable to reach agreement on post-confirmation representational

financial terms, and the Firm has been advised by an E&O insurer that a 10 year commitment would give it cause to extend coverage prospectively. Accordingly, counsel must withdraw as he cannot have a commitment of this type.

The Debtors have expressed great enthusiasm that they will be able to self-manage their Chapter 11 case for ten years, and their ability to work with the United States Trustee program on any issues which may administratively arise. The Debtors have made it plain to the Firm and counsel that they are better off without counsel, and do not require the assistance of counsel except as may occur on an ad hoc basis.

Accordingly, the Debtors have consented to the relief sought within this Motion of consensual withdrawal of any appearance. This does not mean that the undersigned cannot be retained on an “ad hoc” basis for tasks that may be required; however, it will be a limited scope of engagement and controlled by the parties ability to reach consensus in the first instance on what the terms of representation would be.

Given that counsel has received a signed letter authorizing his withdrawal from the Debtors, which he attaches hereto, and given that there is a confirmation hearing set for tomorrow at which counsel will voir dire the Debtors on their choice to proceed without counsel through this post-confirmation process, it is requested that the otherwise applicable 7 day notice be waived.

No memorandum is filed in support hereof pursuant to Local Rule 9013-2.

WHEREFORE, the Firm respectfully requests that the Court enter an Order:

- (i) Granting the Motion to Withdraw; and
- (ii) Striking the appearance of the Firm; and

- (iii) Granting such *other* and further relief as equity and justice may require.

Respectfully Submitted,

-----/S/ John D. Burns-----

John D. Burns, Esquire (#22777)
The Burns LawFirm, LLC
6303 Ivy Lane; Suite 102
Greenbelt, Maryland 20770
(301) 441-8780
Counsel for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2013, a copy of the foregoing Motion and a proposed form of Order, was served via first-class mail, postage prepaid, or by ECF, upon:

Office of the United States Trustee (via ECF)
6305 Ivy Lane; Suite 600
Greenbelt, MD 20770

Jeffrey Kenneth Boyd (via First Class Mail)
Shirley Ann Boyd
702 Coffren Place
Upper Marlboro, MD 20774

-----/S/ John D. Burns-----

John D. Burns